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6 Attorneys for Plaintiff

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 UNILOC 2017 LLC

11 Plaintiff,

12 v.

13 H&R BLOCK, INC. and
14 HRB DIGITAL LLC,

15 Defendant.

Civil Action No. 8:19-cv-01149

COMPLAINT FOR PATENT
INFRINGEMENT

JURY TRIAL DEMANDED

16 Plaintiff, Uniloc 2017 LLC (“Uniloc”), alleges as follows against defendants, H & R Block,
17 Inc. and HRB Digital LLC (together “HRB”):

18 **THE PARTIES**

- 19 1. Uniloc is a Delaware limited liability company.
- 20 2. H & R Block, Inc. is a Missouri corporation having numerous regular and
21 established places of business within this judicial district. *See* www.hrblock.com/tax-offices/.
- 22 3. HRB Digital LLC is a Delaware corporation that distributes tax preparation
23 software to, and for use by, taxpayers within this judicial district.

24 **JURISDICTION**

- 25 4. Uniloc brings this action for patent infringement under the patent laws of the United
26 States, 35 U.S.C. § 271, *et seq.* This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§
27 1331 and 1338(a).

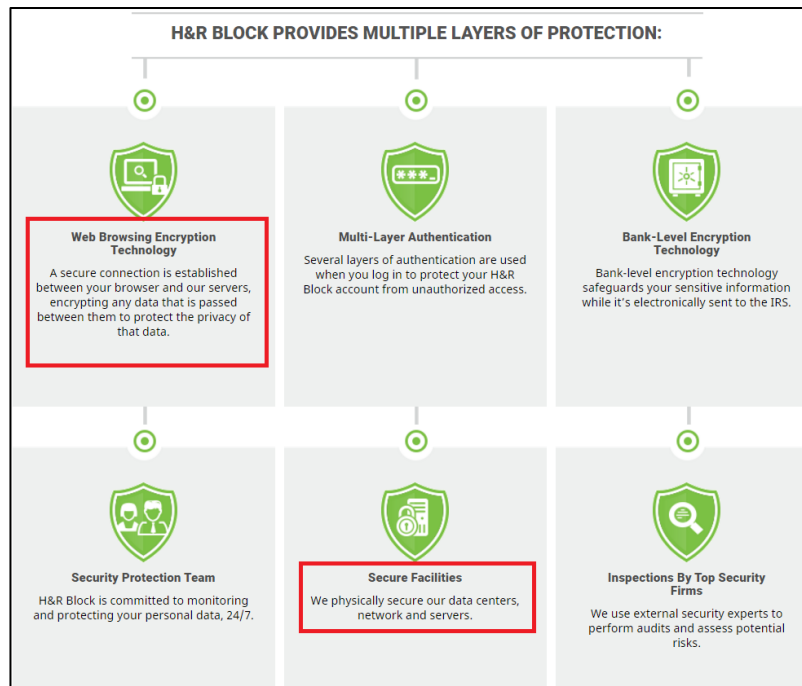
COUNT I

(INFRINGEMENT OF U.S. PATENT NO. 6,324,578)

5. Uniloc incorporates paragraphs 1-4 above, by reference.

6. Uniloc is the owner, by assignment, of U.S. Patent No. 6,324,578 (“the ’578 Patent”), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM PRODUCTS FOR MANAGEMENT OF CONFIGURABLE APPLICATION PROGRAMS ON A NETWORK, that issued on November 27, 2001 on an application filed on December 14, 1998. A copy of the ’578 Patent is attached as Exhibit A.

7. HRB maintains a network of high-security, access-controlled data centers that host a platform through which it offers and provides products and services such as the Free, Deluxe and Premium versions of Online Tax Filing (“HRB platform” or “platform”):

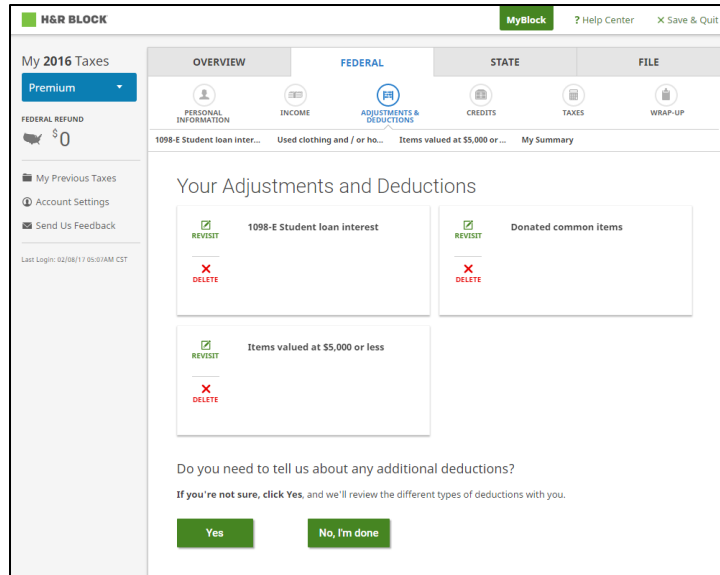


8. A HRB customer launches the Online Tax Filing application downloaded from HRB by creating an account and logging in:

The image displays two screenshots of the H&R BLOCK Sign In interface. The top screenshot shows the full page layout, including the 'Sign In' and 'Create Account' sections. The 'Sign In' section contains fields for 'Username' and 'Password', a 'Remember Me' checkbox, a 'Sign In' button, and a link for 'I forgot my sign-in information.' The 'Create Account' section features a 'Create Account' button. The bottom screenshot is a zoomed-in view of the 'Sign In' section, with the 'Sign In' button highlighted by a red rectangle. The page also includes 'TRUSTe' and 'Norton' security logos at the bottom.

9. When an Online Tax Filing account has successfully been opened with HRB, the user is authorized to proceed with the application.

10. When a user logs in to HRB via the Sign In launcher, the user interface provides a plurality of options to select from, such as preparing Federal or State returns:



11. Once granted access to the HRB platform, a user is presented with a plurality of user-configurable preferences, such as account settings, update password, and update security questions:

12. The HRB platform provides a plurality of administrator-configurable preferences such as password requirements, privacy provisions, and the length of time data is stored:

Account Settings

[Delete This Account](#) [Print Your Settings](#)

In order to update your account settings, first we need to verify your current password.

Current Password (required)

Update Your Password

New Password

Confirm Password

Your password must include:

- At least eight characters
- One uppercase letter
- One lowercase letter
- One number
- One special character (like \$, #, %, or !)

Don't forget, your password is case-sensitive.

Update Your Security Question

These security questions help us verify you.

Security Question 1

In what city were you

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We may update this Privacy Notice to reflect changes to our information practices. If we make a material change to this Privacy Notice, including a material change in the way we use any personal information collected, we will notify you by using one of the following methods at least thirty (30) days prior to the effective date of such change: (1) we will post a notice on our website describing the change; or (2) we will send you an email notifying you of the change.

Effective Date

This Privacy Notice is effective November 10, 2016.

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How do we secure your information?

The security of your personal information is important to us. We maintain appropriate safeguards to protect your information. If you have any questions about the security of our services, you can contact us by [clicking here](#).

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How long do we keep your information?

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13. HRB stores user information provided via the HRB platform to perform operations requested by customers, such as calculating tax payments and refunds.

14. A user may request information from HRB, such as prior taxes paid, and HRB will respond to such a request by providing the user's prior tax information.

15. HRB infringed at least claim 1 of the '578 Patent by making, using, offering for sale, and/or selling the HRB platform, which software and associated architecture allow for installing an application program having configurable preferences and authorized users on a server coupled to a network, distributing an application launcher program to a client, obtaining a user set

1 of the configurable preferences, obtaining an administrator set of configurable preferences, and
2 executing the application program using the user and administrator sets of configurable preferences
3 responsive to a request from a user as described above.

4 16. HRB also infringed at least claim 1 of the '578 Patent by actively inducing the use
5 of the HRB platform. HRB's customers who used the platform in accordance with HRB's
6 instructions infringed the '578 Patent, as described above. HRB intentionally instructed its
7 customers to infringe, with knowledge they were infringing, by providing instructions on how to
8 use the platform.

9 17. HRB also infringed at least claim 1 of the '578 Patent by offering to sell, selling,
10 and/or otherwise commercially offering use of its platform, which was used to infringe the '578
11 Patent and constituted a material part of the invention. HRB knew portions of the software
12 contained in the accused platform were especially written solely for use to implement what HRB
13 knew was infringement of the '578 Patent. HRB knew these portions had no use, other than for
14 infringement.

15 18. HRB has been on notice of the '578 Patent since, at the latest, the service of the
16 complaint upon it on June 8, 2017 in the previous action between Uniloc and H & R Block in the
17 Eastern District of Texas. HRB knew and intended (since receiving that notice) that its continued
18 actions actively induced and contributed to infringement of the '578 Patent.

19 19. HRB may have infringed the '578 Patent through other software and architecture
20 utilizing the same or reasonably similar functionality, including other versions of the HRB
21 platform.

22 20. Uniloc has been damaged by HRB's infringement of the '578 Patent.

23 **COUNT II**

24 (INFRINGEMENT OF U.S. PATENT NO. 7,069,293)

25 21. Uniloc incorporates herein by reference paragraphs 1-20 above.

26 22. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 7,069,293
27 ("the '293 Patent"), entitled METHODS, SYSTEMS AND COMPUTER PROGRAM
28 PRODUCTS FOR DISTRIBUTION OF APPLICATION PROGRAMS TO A TARGET

1 STATION ON A NETWORK, which issued on June 27, 2006, claiming priority to an application
2 filed on December 14, 1998. A copy of the '293 Patent is attached as Exhibit B.

3 23. HRB uses Apache on-demand servers in the United States to host its services:

SSLv3/POODLE	This site does not support the SSL version 3 protocol. More information about SSL version 3 and the POODLE vulnerability.		
Heartbleed	The site did not offer the Heartbeat TLS extension prior to the Heartbleed disclosure, and so was not exploitable. This test does not exploit the Heartbleed vulnerability but uses information from conventional HTTPS requests. More information about Heartbleed detection.		
Assurance	Extended validation		
Organisation	H&R Block Inc.	Common name	idp.hrblock.com
State	Missouri	Country	US
Organisational unit	Enterprise Technology	Subject Alternative Name	idp.hrblock.com
Validity period	From Jul 19 2015 to Jul 19 2017 (24 months)	Matches hostname	Yes
Server	apache	Public key algorithm	rsaEncryption
Protocol version	TLSv1.2	Public key length	2048
Certificate check	ok	Signature algorithm	sha256WithRSAEncryption
Serial number	0x7e0d953e3344adc48645c384d99c8a6	Cipher	AES256-SHA
Version number	0x02	Perfect Forward Secrecy	No
Next Protocol Negotiation	Not Present	Supported TLS Extensions	RFC5746 renegotiation info, RFC4366 server name
Issuing organisation	Symantec Corporation	Issuer common name	Symantec Class 3 EV SSL CA - G3
Issuer unit	Symantec Trust Network	Issuer location	Not Present
Issuer country	US	Issuer state	Not Present
Certificate Revocation Lists	http://sr.symcb.com/sr.crl - 100% uptime in the past 24 hours	Certificate Hash	sw/pFD2FZJCwQDGW1JbTslYh1IA
Public Key Hash	007437f27f494b862870bf5c13a059be3eb11a6b511a5bf3419e7f897b4d960		
OCPSP servers	http://sr.symcd.com - 100% uptime in the past 24 hours		
OCPSP stapling response	No response received		

Accessing Our Services from Outside the United States
Our services are hosted on servers located in the United States. We also use service providers located in the United States to bring you our services. If you access our services from outside the United States, you consent to the transfer of your information, including your personal information, to the United States, a jurisdiction that may not provide the same level of protection to your personal information as your home country.

14 24. HRB infringed, and continues to infringe, at least claim 1 of the '293 Patent by
15 making, using, importing, offering for sale, and/or selling the HRB platform, which software and
16 associated architecture allow for providing an application program for distribution to a network
17 server, specifying source and target directories for the program to be distributed, preparing a file
18 packet associated with the program including a segment configured to initiate registration
19 operations for the application program at a target on-demand server, and distributing the file packet
20 to the target on-demand server to make the program available for use by a client user as described
21 above.

22 25. HRB has been on notice of the '293 Patent since, at the latest, the service of the
23 complaint upon it on June 8, 2017 in the previous action between Uniloc and HRB in the Eastern
24 District of Texas. HRB knew and intended (since receiving that notice) that its continued actions
25 infringed the '293 Patent.

26 26. HRB may have infringed the '293 Patent through other software and architecture
27 utilizing the same or reasonably similar functionality, including other versions of the HRB
28 platform.

1 27. Uniloc has been damaged by HRB's infringement of the '293 Patent.

2 **PRAYER FOR RELIEF**

3 Uniloc requests that the Court enter judgment against HRB as follows:

4 (A) finding that HRB has infringed the '578 Patent and the '293 Patent;

5 (B) awarding Uniloc its damages suffered as a result of HRB's infringement of the '578
6 Patent and the '293 Patent;

7 (C) awarding Uniloc its costs, attorneys' fees, expenses, and interest; and

8 (D) granting Uniloc such further relief as the Court may deem proper.

9 **DEMAND FOR JURY TRIAL**

10 Uniloc hereby demands trial by jury on all issues so triable pursuant to Fed. R. Civ. P. 38.

11
12 Dated: June 10, 2019

Respectfully submitted,

13 /s/ Aaron S. Jacobs

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